

## **Certification of CPNI Filing – February 3, 2006**

### **Moundridge Telephone Company, Inc**

Moundridge Telephone Company, Inc("Moundridge") hereby submits that its procedures regarding its subscribers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Moundridge recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the company. Moundridge takes this responsibility seriously and certifies that it protects and utilizes its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009.

Moundridge employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside of Moundridge, except as follows:

1. Moundridge may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.
2. In the absence of an appropriate written request from the customer, the Company may provide the customer's phone records or other CPNI to a law enforcement agency only in response to a warrant or subpoena that specifies the particular CPNI to be furnished.
3. Moundridge and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.
  - a. The FCC has noted the publishing of directories as an example of this permitted use.
  - b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services.

- c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market “adjunct-to-basic” services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.
- d. Any other use, disclosure or provision of CPNI must be expressly approved in writing by senior management level personnel assigned the responsibility of CPNI oversight by the company.

Moundridge has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important and its employees have been educated about CPNI as well as the related federal regulations and Moundridge’s statutory responsibility to its customers. All requests for subscriber CPNI are forwarded to Senior Management personnel and any unauthorized use, sale, or disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.